

REMARKS

Initially, Applicant wishes to thank the Examiner for the detailed Official Action and for the Notice of References Cited. In addition, Applicant would also like to thank the Examiner for indicating acceptance of the Drawings in the outstanding Official Action. Applicant would also like to thank the Examiner for indicating consideration of each of the documents listed on the Form PTO-1449 submitted with the Information Disclosure Statement on October 4, 2006. Finally, Applicant would like to thank the Examiner for acknowledging consideration of Applicant's claim for foreign priority as well as receipt of a certified copy of the document upon which Applicant's claim for foreign priority is based.

Claim 1 stands objected to for lacking a proper antecedent basis for a claimed element. Claims 1 and 3-7 stand rejected under 35 U.S.C. §103(a) as being unpatentable over LAREAU et al. (U.S. Patent No. 6,972,682) first embodiment in view of LAREAU et al. different embodiment, and further in view of BLEDSOE (U.S. Patent No. 5,742,237). Claim 2 stands rejected under 35 U.S.C. §103(a) as being unpatentable over LAREAU et al. first embodiment and different embodiment, and BLEDSOE and further in view of LASTINGER et al. (U.S. Patent App. Pub. 2003/0030568).

Upon entry of the present amendment, claims 1-7 will have been amended and new claims 8 and 9 will have been added. In particular, claim 1 will have been amended to address the Examiner's concerns with respect to antecedent basis. New claims 8 and 9 recite a feature previously recited in claim 3. The amendments to claims 1-7 and the addition of new claims 8 and 9 should not be considered an indication of Applicant's acquiescence as to any of the outstanding or rejections. Rather, Applicant has amended

claim 1-7 and added new claims 8 and 9 to advance prosecution and to obtain early allowance of the present application.

Initially, Applicants note that the Examiner's Office Action is directed to the originally filed claims, and not claims 1-7 as presented in a Preliminary Amendment filed on July 12, 2006. A review of the current application on the Patent Application Information Retrieval (PAIR) website indicates the Preliminary Amendment was entered on July 12, 2006. Applicant has set forth claims with amendments made in accordance with the Preliminary Amendment. In addition, Applicant notes that the Preliminary Amendment of July 12, 2006 mistakenly set forth two claims numbered as claim "3" and no claim numbered as "4". Accordingly, the second presentation of claim 3 has been renumbered as claim "4" in the present amendment.

Applicant traverses the objection to claim 1. In this regard, claim 1 has been amended, paying attention to the concern raised by the Examiner. In view of the revisions to claim 1, Applicant respectfully requests reconsideration and withdrawal of the objection to claim 1.

Applicant traverses the rejection of claims 1 and 3-7 under 35 U.S.C. §103(a) as being unpatentable over LAREAU et al. in view of BLEDSOE. In this regard, LAREAU et al. is directed to wirelessly tracking and monitoring assets. A coordinate location 414 as disclosed in LAREAU et al. may be in the Cartesian coordinate system (*e.g.*, includes three coordinates x, y, z) and may be programmed wirelessly from a handheld device (*see* Figure 6 and column 15, lines 17-30 of LAREAU et al.). Remote monitoring stations (RMS) 150 read out the coordinate location 414 for monitoring an *absolute* location of the IC tag (as discussed, for example, col. 8, lines 31-34 of LAREAU et al.).

That is, LAREAU et al. does not teach or suggest determining a location of an IC tag, relative to other IC tags. In contrast, claim 1 recites a storage that stores information Y of the one IC tag of the other IC tags specified as a source IC tag by the interrogator in a memory, wherein relative positions of said multiple IC tags are recognized from the information X and the information Y collected via the interrogator. That is, the present application is directed to storing, in the memory of an IC tag, information Y of adjacent IDs and transmitting this information to an interrogator to identify the relative position of an IC tag (*see*, for example, Figure 4 and page 5, lines 19-33 of Applicant's specification as filed).

The Examiner asserts portions of LAREAU et al. in Figure 2 and column 6, lines 20-50 as teaching the combination of features recited in claim 1 and in particular, a system in which communication between an interrogator and an IC tag and communication between the IC tag and adjacent IC tags. In this regard, the Examiner asserts that in a first embodiment of LAREAU et al., each RFID tag is configured to wirelessly communicate with other tags and an RMS, and that each tag communicates with RMS 150 within a determined proximity.

In addition, the Examiner asserts column 7, lines 7-21 as teaching a transmission means and reception means for sending out probe signals to other IC tags. In this regard, Applicant submits that LAREAU et al. teaches that a downstream payload from the RMS is relayed to numerous intermediate tags until reaching a destination. Subsequently, destination IC tags process downstream communication and return upstream communication along the same path. Applicant submits that LAREAU et al. fails to teach (or even suggest) a transmitter for sending probe signals to other IC tags when own

information X (i.e., information associated with the IC tag that sends the probe signals) is specified by an interrogator, as recited in claim 1.

Further, LAREAU et al. does not teach or suggest a second responder that responds with information Y of a source IC tag stored in the memory to the interrogator in response to a readout command, as specified in claim 1. That is, LAREAU et al. fails to teach (or even suggest) that the information is stored by the IC tag until the interrogator sends a command specifically requesting the information. Moreover, LAREAU et al. does not teach two distinct communication areas and in particular, a communication area B that is smaller than a communication area A in which an IC tag sends out probe signals to adjacent IC tags, as specified by claim 1.

The Examiner relies upon BLEDSOE as teaching a system that relates to a tag location system to track the location of marked items in which the system comprises a monitor and one or more tags on an object, in which the monitor can get a rough idea of how far away a particular tag is by the strength of a received signal. Applicant submits that BLEDSOE fails to teach that the signal strength is that of a probe signal. Rather, the cited portions of BLEDSOE in column 6, lines 23-29 teach determining the location of a tag based on triangulation and signal strength, in particular by calculating the distance of the tag from three or more monitors. Further, BLEDSOE does not cure the above-noted deficiencies of LAREAU et al.

Accordingly, Applicant respectfully submits that independent claim 1 is allowable over LAREAU and BLEDSOE for at least the reasons noted above.

Applicant also submits that, the method of independent claim 7 is allowable for reasons similar to those noted above with respect to independent claim 1, in addition to reasons related to its own recitations.

Applicant respectfully submits that each of dependent claims 3-6 are allowable at least because they depend from independent claim 1, which Applicant submits has been shown to be allowable. Each of dependent claims 3-6 are also submitted to recite further patentable subject matter. As such, allowance of the dependent claims is deemed proper for at least the same reasons noted above for independent claim 1 upon which claims 3-6 depend, in addition to reasons related to their own recitations.

Accordingly, reconsideration and withdrawal of the rejection of claims 1 and 3-7 under 35 U.S.C. §103(a) over LAREAU et al. (first embodiment and different embodiment) in view of BLEDSOE is respectfully requested.

Applicant respectfully traverses the rejection of claim 2 under 35 U.S.C. §103(a) over LAREAU et al. (first and different embodiments) and in view of BLEDSOE and further in view of LASTINGER et al.. In this regard, arguments made above with respect to the rejection of claim 1 over LAREAU et al. in view of BLEDSOE are applicable insofar as claim 2 depends from independent claim 1.

Further, LAREAU et al. is directed to a method in which a fixed path is determined *a priori* and is provided to the destination tag. That is, an RMS as described in LAREAU et al. does not obtain all possible combinations of the information X and information Y, nor join any of the combinations having one side of information in common so that locations and arrangement order of said multiple IC tags are specified, as specified in claim 2.

The Examiner additionally relies upon LASTINGER. LASTINGER discloses a low frequency transmitter that transmits location identification information to a tag in the vicinity of the transmitter. However, LASTINGER does not cure the deficiencies of LAREAU et al. or BLEDSOE. More particularly, LASTINGER does not teach two

distinct communication areas with respect to a single interrogator-IC tag pair. Further, LASTINGER does not teach a communication area that is determined based on an IC tag.

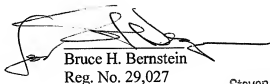
Accordingly, Applicant respectfully submits that claim 2 is allowable over the Examiner's combination of LAREAU et al., BLEDSOE and LASTINGER at least for the reasons set forth above. Reconsideration and withdrawal of the rejection of claim 2 under 35 U.S.C. §103(a) over LAREAU et al., BLEDSOE and LASTINGER is thus respectfully requested.

At least in view of the herein contained amendments and remarks, Applicant respectfully requests reconsideration and withdrawal of each of the outstanding objection and rejections, together with an indication of the allowability of all pending claims, in due course. Such action is respectfully requested and is believed to be appropriate and proper.

Should an extension of time be necessary to maintain the pendency of this application, including any extensions of time required to place the application in condition for allowance by an Examiner's Amendment, the Commissioner is hereby authorized to charge any additional fee to Deposit Account No. 19-0089.

Should the Examiner have any questions concerning this Response or the present application, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully Submitted,
Takashi TANAKA

A handwritten signature in black ink, appearing to read "Bruce H. Bernstein", is written over a horizontal line.

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October 14, 2008
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